

In the Matter of)	FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY
)	
Implementation of)	
Sections 3(n) and 332 of the)	GN Docket
Communications Act)	No. 93-252
)	
Regulatory Treatment of Mobile Services)	

REPLY OF SEIKO TELECOMMUNICATION SYSTEMS

SEIKO Telecommunication Systems, Inc. ("STS"), by its attorneys and pursuant to Section 1.429 of the Commission's Rules, 47 C.F.R. § 1.429, hereby replies to the comments filed regarding its petition for clarification and/or reconsideration of the Commission's Second Report and Order in the above-captioned proceeding. 9 F.C.C. Rcd. 1411 (1994). In its petition, STS requested clarification/reconsideration with respect to just one word in the Commission's decision, namely, the apparently inadvertent equation of the word "authorization" with the word "license" in Section 20.5(a) of the Rules.

None of the parties in this proceeding opposes STS's request for clarification and/or reconsideration, and one party, Cue Network Corporation ("Cue"), filed a similar request. Indeed, only one party, MCI Telecommunications Corporation ("MCI"), addressed the issue at all, and MCI stated that it has "no quarrel" with the STS/Cue petitions. MCI Comments at 13.

MCI expressed a minor concern regarding other, unidentified services in which the term "authorization" is used to refer to licenses for which construction notifications or notices of commencement of commercial

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operations have not yet been given. Id. STS is not aware of any radio service, mobile or fixed, that is subject to Title III and that currently receives an exemption from the Section 310(b) requirements, regardless of how the radio station license is informally referred to, and regardless of whether the licensee has completed construction or begun commercial operations. Indeed, the application forms for all Title III licenses require applicants to certify that they meet the Section 310(b) requirements. The clarification requested by STS and Cue thus would have no impact on services that already are subject to Section 310(b).

STS urges the Commission to adopt STS's unopposed proposal to change Section 20.5(a) by replacing the word "authorizations" in the second sentence with the word "licenses." Alternatively, the Commission should reiterate its guidance that Section 310(b) applies only to Title III licensees, and not to those holding FM subcarrier authorizations pursuant to Title II.

Respectfully submitted,

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June 27, 1994

CERTIFICATE OF SERVICE

I, Ginger S. Pribble, hereby certify that on this 27th day of June, 1994, a copy of the foregoing Reply of SEIKO Telecommunication Systems, Inc. was served by first class, postage prepaid mail, on the following parties:

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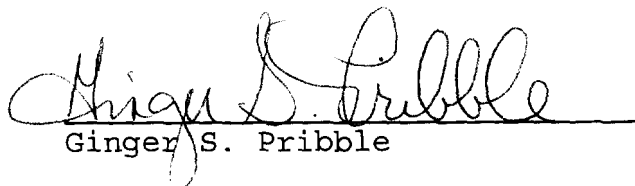
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